## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

ANGEL DAVID MORALES VALLELLANES, Plaintiff,

 $\mathbf{v}_{ullet}$ 

JOHN POTTER, UNITED STATES POSTMASTER GENERAL, ET ALS., Defendants.

CIVIL NO. 97-2459 (GAG)

DAMAGES BASED ON RETALIATION AND DISCRIMINATION; PROHIBITED PERSONNEL PRACTICES; UNFAIR LABOR PRACTICES; BREACH OF COLLECTIVE BARGAINING AGREEMENT

TRIAL BY JURY IS HEREBY REQUESTED

## MOTION FOR EXTENSION OT TIME TO NOTIFY REPORT OF EXPERT WITNESS GUILLERMO HOYOS

**COMES NOW**, plaintiff Angel David Morales-Vallellanes through his legal counsel and very respectfully inform this Honorable Court:

- 1. This party filed last week a motion within three (3) weeks would notify the expert witness's reports.
- 2. As for economist Vicente Feliciano his report will be notified within the schedule, but in the case of Doctor Guillermo Hoyos' report it will not be ready until the end of June or the beginning of July.
- 3. In the case of Doctor Hoyos he is in the process of gathering documents to prepare a report that goes back almost ten (10) years.

**WHEREFORE**, it is respectfully requested from this Honorable Court for an extension of time until the beginning of July 2006 to notify Doctor Guillermo Hoyos' report for plaintiff.

## RESPECTFULLY SUBMITTED.

I HEREBY CERTIFY that on May 18th, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following: Fidel A. Sevillano-Del Río, Esq., Assistant U.S. Attorney, Federico Degetau Federal Build., 150 Carlos Chardón Av., Hato Rey, Puerto Rico 00918.

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